REMARKS

This Amendment and the following remarks are intended to fully respond to the Office Action dated November 16, 2004. In that Office Action, claims 1-36 were examined, and all claims were rejected. Specifically, claims 1-6, 8-28 and 30-36 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Boothby (USPN 6,799,190); Prasad et al. (USPN 6,539,381); and Jolissant et al. (USPN 6,463,149); and claims 7 and 29 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Boothby; Prasad et al.; and Jolissant et al. as applied to claims 1 and 26, and further in view of Robertson (USPN 6,269,369). Additionally, claims 1-36 were objected to as being mis-numbered.

Applicants respectfully requests reconsideration of these rejections and objections in view of the following remarks.

A. Claim Objections

Claims 1-36 stand objected to as being mis-numbered. Applicants filed a Preliminary Amendment on December 3, 2004 correcting the numbering of these claims, and as a result, original claims 26-36 have been renumbered as claims 29-39, respectively. The following remarks address the outstanding rejections to the claims of this application with reference to the claims as renumbered in the Preliminary Amendment.

B. Claims 1-21 and 29-37: Rejections under 35 U.S.C. §103

Generally, independent claims 1, 15 and 29 relate to synchronizing identity information between computer systems that store the identity information in different formats. Each of these claims recites determining that new identity information exists on one of two computer systems and converting the format of the new identity information to the format associated with the other computer system. While claims 1 and 15 are directed to a method for performing this functionality, claim 29 recites this functionality as a system having a control module for practicing the determining operation and a conversion module for practicing the converting operation.

Turning now to the applicable references at issue with regard to independent claims 1, 15 and 29, Boothby is directed to synchronizing two databases by adding, modifying or deleting records in one of the databases to coincide with such manipulation on the other database. See

Boothby, at Col. 2, lines 30-31. However, Boothby falls short of teaching these records being identity data. Boothby also fails to teach any type of information being stored in a different format on either of the two databases, and as such, provides absolutely no teaching that conversion is required in order for one of the databases to synchronize with the other if a record in the other database has been added, modified or deleted. The Examiner even admits in the Office Action that Boothby fails to disclose such conversion, and consequently combines Boothby with Prasad to support the outstanding obviousness-type rejections of all claims. Office Action, at page 4.

Prasad pertains to synchronizing database information between a plurality of server computers distributed over a communications network. Prasad, at Col. 1, lines 8-10. Database information stored on one of the plurality of servers is stored on one or more of the other servers on the communications network as a "replica." Various servers on the communication network are not capable of communicating with other servers, see Prasad, at Col. 1, lines 63-66, and therefore, Prasad teaches a state-based protocol for use by the servers to effectuate synchronization between such servers. See Prasad, at Col. 3, lines 1-13. Like Boothby, Prasad falls short of teaching identity information being the type of information synchronized using this state-based protocol.

As noted above, each of claims 1, 15 and 29 recite the synchronization of identity information that is stored on different computer systems in different formats, and further recite the conversion of new identity information into a different format to effectuate synchronization of this information between the different computers. Both Boothby and Prasad fail to teach the storage of any type of database information on different systems in different formats. The Examiner has provided citations to support the outstanding rejections, but Applicant respectfully requests re-analysis of these cited passages, which in no way teach or even suggest the storage of database information in different formats on different systems. It thus appears, at least, that the Examiner is failing to take into account explicit recitations in each of these claims that must be proven in order to establish a prima facie case of obviousness.

Because neither Boothby nor Prasad teach storing identity information in different formats on different systems, it necessarily follows that neither reference teaches the conversion of identity information into a different format. Indeed, there is no need for format conversion in either of these systems, and as such, both references fail altogether to provide even a motivation

or suggestion for such conversion. In the Office Action, the Examiner cites Col. 17, lines 30-43 of Prasad as teaching the converting steps that Boothby fails to teach, presumably because the term "converts" is used in this paragraph. However, there are many contexts in which the term "convert" may be used when referring to database information and Applicant respectfully submits that the Examiner is reading this cited passage out of its intended context. In this particular paragraph, the use of the term "convert" is used in relation to the deletion of a replica in a server when the associated database information is deleted on another server. Indeed, the paragraphs preceding this cited passage pertain to the different states (e.g., RS_DYING and RS_DEAD) that these two servers achieve to effectuate deletion of the replica. See Prasad, at Col. 16, line 66 - Col. 17, line 29. The deletion of a replica on a server has absolutely nothing to do with format conversion of database information. In fact, deletion of a replica is an operation directly contradictory to conversion of new identity information into a different format. In the former, information is being removed from a database, while in the latter, information is being added into a database.

For at least the foregoing reasons, the combination Prasad and Boothby fails to teach all limitations recited in claims 1, 15 and 29, and thus, does not establish a prima facie case of obviousness over these claims. Claims 1, 15 and 29 are therefore believed allowable over Prasad and Boothby, as are claims 2-14, 16-21 and 29-37, which depend from claims 1, 15 and 29, respectively, and consequently, recite at least those limitations described above as being deficient from the teachings of the Prasad and Boothby.

C. Claims 22-28 and 38-39: Rejections under 35 U.S.C. §103

In general, independent claims 22 and 38 relate to synchronizing rule information between computer systems. The rule information is associated with identity information stored in representative databases on each of the computer systems. These claims recite determining that new identity information exists on one of two computer systems and synchronizing the two computer systems by propagating the new rule information to the other computer system. While claim 22 is directed to a method for performing this functionality, claim 38 recites this functionality as a system having a control module for practicing the determining operation and a synchronization module for practicing the propagating operation.

Claims 22-26 and claims 38-39 are hereby amended to clarify the present invention as it relates to synchronizing rules between computer system. It should be appreciated that these

amendments have not been made to distinguish the present invention over prior art. Indeed, neither Boothby nor Prasad teach synchronizing rules between disparate computer systems. The Examiner, though rejecting claims 22 and 38 in the Office Action in view of these references, has not provided any teaching therein as to synchronization of rules. In fact, nowhere in the Office Action does the Examiner even address the explicitly recited "rule information" and the synchronization thereof. As described in the specification, rule information is associated with the identity information and represents a function that is to be performed on each of the disparate computer systems in association with identity information. Page 15, lines 1-31. Boothby and Prasad do not teach the synchronized information being related in any manner to a function that it to be implemented on a computer system. As such, claims 22 and 38 as well as claims 23-28 and claim 39, which depend from claims 22 and 38, respectively, are believed allowable over Boothby and Prasad and the Examiner has not provided any arguments to the contrary.

Dependent claims 23 and 39 further recite the rule information being stored in different formats on the different computer systems and the conversion of the new rule information into a different format for storage on the computer system to which the information is propagated. As such, claims 23 and 29 are further allowable over Prasad and Boothby for those reasons stated above with reference to independent claims 1, 15 and 29.

CONCLUSION

This Amendment fully responds to the Office Action mailed on November 16, 2004. Still, that Office Action may contain arguments and rejections and that are not directly addressed by this Amendment due to the fact that they are rendered moot in light of the preceding arguments in favor of patentability. For example, the obviousness rejection in view of Jolissant et al. regarding the synchronization interface of claim 29 is not addressed due to the base rejection of Prasad-Boothby being improper. Hence, failure of this Amendment to directly address an argument raised in the Office Action should not be taken as an indication that the Applicant believes the argument to have merit. Furthermore, the claims of the present application may include other elements, not discussed in this Amendment, which are not shown, taught, or otherwise suggested by the art of record. Accordingly, the preceding arguments in favor of patentability are advanced without prejudice to other bases of patentability.

Should the Examiner have any remaining questions or concerns, he/she is encouraged to contact the undersigned attorney by telephone to expeditiously resolve such concerns. Because this Amendment is being filed on or before February 16, 2005, no fees are believed due for submission of this Amendment. However, if this is not the case, please charge any such fees to Deposit Account No. 13-2725. Alternatively, please credit any overpayment to Deposit Account No. 13-2725.

Respectfully submitted,

Dated: February 16, 2005

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